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8 **UNITED STATES BANKRUPTCY COURT**
9 **IN AND FOR THE EASTERN DISTRICT OF WASHINGTON**

10 **In re:**

11 **EASTERDAY RANCHES, INC. et**
12 **al.,**
Debtors.

NO. 21-00141-WLH11

CH 11
JOINTLY ADMINISTERED

13 JOINDER ON WEYNS &
14 SUNRAY'S RESPONSE IN
SUPPORT OF MOTION FOR
ADEQUATE PROTECTION

15
16 BRAD CURTIS FARMS, LLC., hereby joins in the motion of Weyns Farms and
17 Sunray Farms (ECF 563) in response to the objections filed by the Unsecured Creditors
18 Committee and Washington Trust Bank. Brad Curtis Farms had filed a joinder in the
19 original motion for adequate protection as Brad Curtis Farms is a feed supplier that has
20 filed a lien under RCW 60.13 for protection.

21 1. Brad Curtis Farms, LLC provided feed per contract to Debtors. The lien
22 was then attached and automatically perfected upon delivery of the products under
23 RCW 60.13.030. This lien continues without filing or any other action by the producer for
24 JOINDER ON MOTION FOR ADEQUATE PROTECTION AND
OBJECTION TO ORDER AUTHORIZING USE OF FINAL CASH COLLATERAL
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1 a period of twenty days after payment remains unpaid. Brad Curtis Farms, LLC filed
2 their lien on March 4, 2021, prior to payment being due¹, therefore the Brad Curtis
3 Farms, LLC lien was fully perfected.

4 2. As argued in the Weyns/Sunray response, producers of ag products rely
5 upon the preparer/producer lien statutes to protect themselves. These producers have
6 availed themselves to the laws that protect them, under a statutory framework put in
7 place to protect producers just like these. From a common sense standpoint, these
8 producers have already used their resources to produce the crop, provided that crop to
9 a feedlot, and filed the necessary paperwork to protect themselves, waiting for the
10 money due to them because they know they have protections under the statute. For the
11 Committee to come in and undermine that process violates the rules of commerce. The
12 caselaw cited in the brief is compelling and illustrates that this court should not allow the
13 Committee to compel the court to legislate.

14 3. Brad Curtis Farms, LLC has reviewed the Response In Support of Motion
15 for Adequate Protection and joins in said Response, seeking the same remedy as
16 requested in the original motion.

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18 Date April 13, 2021 Signature /s/ Toni Meacham
19 Name
20 Address **Toni Meacham Attorney At Law**
21 **1420 Scooteney Rd**
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23 ¹ Under the contract between the parties payment was not due until May 15, 2021. As a result, Curtis did not file a
24 lien statement pre-petition as no payment was yet due.